



Rich Puvogel

08/12/05 09:34 AM

To: Monica Mahar/R2/USEPA/US@EPA

cc:

Subject: Re: m/rh pcors

Monica,

Wow! Someone sure reviewed that quick.

In the PCOR it is mentioned that "institutional controls have been included in the selected remedy" (bottom of page 7 of Montgomery PCOR and second paragraph of page 8 of the Rocky Hill PCOR).

I went to take a peek at the ROD to research the issue, opened your file draw and nearly freaked! No files! Ahhh!!! I know you told me that you reorganized but I didn't remember you telling me that you moved the files. I looked in your reorganized drawer and found the ROD in no time. Whew!

The statement in the PCOR above refers to the statement in the 1988 ROD (Statutory Determinations section, page 15, second to last paragraph on the page) that states "institutional controls will be in place during the restoration period..." although the ROD was not specific on the institutional controls.

I believe that the HQ reviewer interpreted the sentence about institutional controls in the PCOR to mean that institutional controls were implemented. However the PCOR sentence only mentions that institutional controls were included in the selected remedy. The reviewer's interpretation may have been reinforced by placement of the sentence in the Post Construction Activities section of the PCOR. Within such context, I could see how the sentence could be interpreted that institutional controls were implemented.

I recommend that, since institutional controls are a component of the remedy selected in the ROD, that we leave mention of institutional controls in the PCOR. If the sentence leads the reader to believe that institutional controls have been implemented then I could revise the PCOR institutional control sentence to read as follows: "Institutional controls are a component of the selected remedy." which leads nicely into the following sentence's mention of NJDEP's intention to establish a CEA.

How do you want to proceed on the issue?
Rich

Monica Mahar/R2/USEPA/US

**Monica
Mahar/R2/USEPA/US**

08/11/2005 02:34 PM

To: Rich Puvogel/R2/USEPA/US@EPA

cc

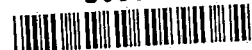
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*Carole - RA
report approved*

Hi,

HQ is reviewing the pcors and commented on how we mentioned the fact that institutional controls were implemented at the site (and then talk about NJ's planned CEA). I don't think there

300083



1.
were any institutional controls in the ROD, unless you can think of something? thanks.

CPM

Jan. 2000

→ Close out procedures

Chap# 3 pg. 3-5

Box GW + surface
H₂O

Highlight

~~Build~~ Final RA

The CU involving

Cleanup Goals

Interim Report

MCLs Final Cleanup

Final Report